

Gordon & Rees LLP  
300 South Fourth Street, Suite 1550  
Las Vegas, NV 89101

LIANE S. BINOWITZ, ESQ.  
Nevada Bar No. 7482  
**GORDON & REES LLP**  
300 South Fourth Street, Suite 1550  
Las Vegas, Nevada 89101  
Telephone: (702) 577-9300  
Facsimile: (702) 255-2858  
[LBinowitz@gordonrees.com](mailto:LBinowitz@gordonrees.com)

*Attorneys for Defendant*  
**MATTHEW VICKERS**

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

GILDA ROMAN-PADILLA, an Individual,	)	CASE NO. 2:16-CV-00671-GMN-PAL
	)	
	)	
Plaintiff,	)	
vs.	)	
	)	
	)	
MATTHEW VICKERS, an individual; DOES I-X;	)	
and ROE Corporations I-X, Inclusive,	)	
	)	
Defendant.	)	
	)	
	)	

**STIPULATION AND ORDER FOR PLAINTIFF'S**  
**INDEPENDENT MEDICAL EXAMINATION**

Defendant Matthew Vickers and Plaintiff Gilda Roman Padilla, by and through their respective counsels, respectfully submit this Stipulation and proposed Order for an Independent Medical Examination (neurosurgical) (IME) under Federal Rule of Civil Procedure 35.

.....  
.....  
.....  
.....  
.....  
.....  
.....  
.....

1 The parties hereby stipulate that **Plaintiff Gilda Roman-Padilla** will submit to a  
2 neurosurgical Independent Medical Examination on September 9, 2016 at 10:00 a.m. at  
3 Western Regional Center for Brain and Spine Surgery, 2471 Professional Court, Las Vegas,  
4 Nevada, 89128, by Jason E. Garber, M.D. Plaintiff Gilda Roman-Padilla may not be  
5 accompanied at the examination by any individual. The examination will not be audiotaped,  
6 videotaped, or recorded.

7 Dated this 16<sup>th</sup> day of August 2016.

Respectfully submitted,

8 GORDON & REES LLP

9 By: /s/ Liane S. Binowitz  
10 LIANE S. BINOWITZ, ESQ.  
11 Nevada Bar No. 7482  
12 300 South Fourth Street  
13 Suite 1550  
Las Vegas, Nevada 89169  
*Attorneys for Defendant*  
*Matthew Vickers*

14 Dated this 16<sup>th</sup> day of August 2016.

LADAH LAW FIRM

15 By: /s/ Joseph C. Chu  
16 JOSEPH C. CHU, ESQ.  
17 Nevada Bar No. 11082  
18 517 South Third Street  
19 Las Vegas, NV 89101  
20 *and*  
LIBORIUS AGWARA, ESQ.  
4693 E. Flamingo Road  
Las Vegas, Nevada 89121  
*Attorneys for Plaintiff*

21 **ORDER**

22 IT IS SO ORDERED.

23  
24   
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: August 24, 2016

Gordon & Rees LLP  
300 South Fourth Street, Suite 1550  
Las Vegas, NV 89101